

**Exhibit B**

**November 9, 2021 E-Mail to Shawn Johnson**

**From:** [Miller, Jeri Leigh](#)  
**To:** ["Rosenstein, Ross"](#); [Califano, Thomas R.](#); [Shawn Johnson](#); [Robert Albergottti](#)  
**Cc:** [Hoffman, Juliana](#); [Niemann, Matthew \(NON-SIDLEY @HL.COM\)](#); [Jordan, Brad](#); [Persons, Charles M.](#); [Robert Burford](#); [Nate Paul](#); [Sheena Paul](#); [Barbie Lee](#); [Sudolsky, Alex](#); [Minanov, Alexander](#); [Lenhart, Will](#)  
**Subject:** RE: November DIP account withdrawals in first week in November  
**Date:** Tuesday, November 9, 2021 4:03:18 PM  
**Attachments:** [image001.png](#)

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Shawn,

Please confirm your agreement with the steps outlined below. We are working on memorializing these in an agreed stipulation, which can be filed with the Court as well.

Thanks,

**JERI LEIGH MILLER**

Associate

**SIDLEY AUSTIN LLP**

+1 214 981 3432

[jeri.miller@sidley.com](mailto:jeri.miller@sidley.com)

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**From:** Rosenstein, Ross <RRosenstein@HL.com>  
**Sent:** Tuesday, November 9, 2021 9:43 AM  
**To:** Califano, Thomas R. <tom.califano@sidley.com>; Shawn Johnson <sjohnson@BURFORDPERRY.COM>; Robert Albergottti <albergotttib@gmail.com>  
**Cc:** Miller, Jeri Leigh <jeri.miller@sidley.com>; Hoffman, Juliana <jhoffman@sidley.com>; Niemann, Matthew (NON-SIDLEY @HL.COM) <mniemann@hl.com>; Jordan, Brad <BJordan@HL.com>; Persons, Charles M. <cpersons@sidley.com>; Robert Burford <rburford@BURFORDPERRY.COM>; Nate Paul <npaul@world-class.com>; Sheena Paul <spaul@world-class.com>; Barbie Lee <blee@world-class.com>; Sudolsky, Alex <ASudolsky@HL.com>; Minanov, Alexander <AMinanov@HL.com>; Lenhart, Will <WLenhart@HL.com>  
**Subject:** RE: November DIP account withdrawals in first week in November

Shawn,

Now that Bob has sent across his license, here are his proposed next steps that should help make the process more efficient:

- 1) Finalize Bob's account access – once access info for remaining accounts is sent across we will work with Bob to ensure he can access accounts and revert with any issues
- 2) By Thursday of every week (starting this week) Barbie should send Bob (cc HL/Sidley) a schedule of planned disbursements (wires, checks, etc.) for the following week so that Bob can review and approve
  - a. The schedule should be broken out by account
  - b. A separate schedule should be included for all proposed payments/reimbursements/transfers to insiders or affiliates
- 3) By Friday of this week Barbie to send Bob (cc HL/Sidley) a list of automatic recurring (weekly or monthly) payments to vendors (non-insiders)
  - a. Schedule to include frequency, date and amount of last payment, account that paid last payment, proposed account to pay invoices going forward and any other necessary information
  - b. Schedule to be broken out by accounts
- 4) By Friday of this week send end of October 2021 bank statements for all accounts

Hopefully this will ameliorate any near-term account access issues. Please let us know if this works or if you have suggestions/edits.

Thank you,  
Ross

**Ross Rosenstein**

**HOULIHAN LOKEY**

+1.646.259.7422 **Work**

+1.859.421.5430 **Mobile**

[rossenstein@hl.com](mailto:rossenstein@hl.com)

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**From:** Califano, Thomas R. <[tom.califano@sidley.com](mailto:tom.califano@sidley.com)>

**Sent:** Monday, November 8, 2021 11:11 PM

**To:** Shawn Johnson <[sjohnson@BURFORDPERRY.COM](mailto:sjohnson@BURFORDPERRY.COM)>; Robert Albergottti <[albergottib@gmail.com](mailto:albergottib@gmail.com)>

**Cc:** Rosenstein, Ross <[RRosenstein@HL.com](mailto:RRosenstein@HL.com)>; Miller, Jeri Leigh <[jeri.miller@sidley.com](mailto:jeri.miller@sidley.com)>; Hoffman, Juliana <[jhoffman@sidley.com](mailto:jhoffman@sidley.com)>; Niemann, Matthew <[MNiemann@HL.com](mailto:MNiemann@HL.com)>; Jordan, Brad <[BJordan@HL.com](mailto:BJordan@HL.com)>; Robert Burford <[rburford@BURFORDPERRY.COM](mailto:rburford@BURFORDPERRY.COM)>; Nate Paul <[npaul@world-class.com](mailto:npaul@world-class.com)>; Sheena Paul <[spaul@world-class.com](mailto:spaul@world-class.com)>; Barbie Lee <[blee@world-class.com](mailto:blee@world-class.com)>; Sudolsky, Alex <[ASudolsky@HL.com](mailto:ASudolsky@HL.com)>; Minanov, Alexander <[AMinanov@HL.com](mailto:AMinanov@HL.com)>; Lenhart, Will <[WLenhart@HL.com](mailto:WLenhart@HL.com)>

**Subject:** RE: November DIP account withdrawals in first week in November

**This message is from an external sender.**

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Shawn-

Counsel will talk in the morning. Your proposal is not acceptable. Let me know when you and Bob Burford are available. Everything will go through me for the time being.

Thank you

Sent with BlackBerry Work  
([www.blackberry.com](http://www.blackberry.com))

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**From:** Shawn Johnson <[sjohnson@BURFORDPERRY.COM](mailto:sjohnson@BURFORDPERRY.COM)>

**Date:** Monday, Nov 08, 2021, 9:16 PM

**To:** Robert Albergottti <[albergottib@gmail.com](mailto:albergottib@gmail.com)>

**Cc:** Ross Rosenstein <[rrossenstein@hl.com](mailto:rrossenstein@hl.com)>, Miller, Jeri Leigh <[jeri.miller@sidley.com](mailto:jeri.miller@sidley.com)>, Hoffman, Juliana <[jhoffman@sidley.com](mailto:jhoffman@sidley.com)>, Niemann, Matthew (NON-SIDLEY @HL.COM) <[mniemann@hl.com](mailto:mniemann@hl.com)>, Brad Jordan <[bjordan@hl.com](mailto:bjordan@hl.com)>, Califano, Thomas R. <[tom.califano@sidley.com](mailto:tom.califano@sidley.com)>, Robert Burford <[rburford@BURFORDPERRY.COM](mailto:rburford@BURFORDPERRY.COM)>, Nate Paul <[npaul@world-class.com](mailto:npaul@world-class.com)>, Sheena Paul <[spaul@world-class.com](mailto:spaul@world-class.com)>, Barbie Lee <[blee@world-class.com](mailto:blee@world-class.com)>, Sudolsky, Alex <[ASudolsky@HL.com](mailto:ASudolsky@HL.com)>, Minanov, Alexander <[AMinanov@HL.com](mailto:AMinanov@HL.com)>, [wlenhart@hl.com](mailto:wlenhart@hl.com) <[wlenhart@hl.com](mailto:wlenhart@hl.com)>

**Subject:** RE: November DIP account withdrawals in first week in November

Bob,

I appreciate your email. I think a Zoom meeting tomorrow would be helpful to resolve bank-account cutover. It seems like something has been getting lost in translation in emails---for example, a copy of your driver's license is required per Barbie's email below (not just your driver's license number). A Zoom meeting is a more efficient way to get this taken care of, hopefully in one session. Will you give me a time tomorrow afternoon that you can block off up to two hours for a Zoom meeting so that we can work through online access and signatory authority? Zoom would be better than a phone call because we can have you share your screen to work through the diagnosis and cure together. Perhaps the Hoolihan folks needing access can join as well?

If time permits, we can also discuss next steps and process going forward. I suspect that the bulk of our time will be focused on banking.

We also propose a standing weekly touchpoint Zoom meeting on a go-forward basis so we can work through action items like bank-account cutover.

Best wishes,

Shawn

**Shawn A. Johnson**  
Associate



Burford Perry, LLP  
2 Houston Center | 909 Fannin St., Ste 2630  
Houston, Texas 77010  
(ph) 713-401-9790 | (fax) 713-993-7739  
(cell) 713-454-9849 | [Website](#) | [Bio](#)

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**From:** Robert Albergotti <[albergottib@gmail.com](mailto:albergottib@gmail.com)>

**Sent:** Monday, November 8, 2021 1:27 PM

**To:** Barbie Lee <[blee@world-class.com](mailto:blee@world-class.com)>

**Cc:** Ross Rosenstein <[rossenstein@hl.com](mailto:rossenstein@hl.com)>; Miller, Jeri Leigh <[jeri.miller@sidley.com](mailto:jeri.miller@sidley.com)>; Juliana Hoffman <[jhoffman@sidley.com](mailto:jhoffman@sidley.com)>; Matthew Niemann <[MNiemann@HL.com](mailto:MNiemann@HL.com)>; Brad Jordan <[bjordan@hl.com](mailto:bjordan@hl.com)>; Thomas Califano Esq. <[tom.califano@sidley.com](mailto:tom.califano@sidley.com)>; Robert Burford <[rburford@BURFORDPERRY.COM](mailto:rburford@BURFORDPERRY.COM)>; Shawn Johnson <[sjohnson@BURFORDPERRY.COM](mailto:sjohnson@BURFORDPERRY.COM)>; Nate Paul <[npaul@world-class.com](mailto:npaul@world-class.com)>; Sheena Paul <[spaul@world-class.com](mailto:spaul@world-class.com)>

**Subject:** Re: November DIP account withdrawals in first week in November

All ACH's should continue unless they are to Nate or any of his companies or family. Also, if near term future disbursements are to regular vendors (who are not affiliated with Nate or his companies) and in approximately similar amounts to prior payments you are authorized to pay

them without any further approval from me. If feasible, I'd like to be in a position in the next few days to see each day's planned check/wire run, before the checks and wires go out. Also, it appears that payroll for all or part of November has already been sent to the management company. I do not want to interfere with the management company employees being paid so if there is another November payroll that needs to be sent to management company just tell me the amount and the pay period for which it applies.

Why was the management fee paid to World Class rather than to the management company. I believe in each of the prior periods, the management fee was paid to GVS LLC.

Account access is one of my highest priorities; and one of the main reasons I wanted to have a call with you today was to discuss my and Houlihan's difficulty accessing bank accounts and statements.

Houlihan and I can only access (i) the Chase DIP account and do not have any historical access to that account (i.e., from June 17 to roughly late October 2021); and (2) the Trustmark Acct for the Mississippi locations. Neither I nor Houlihan can get into any of the Key Bank, PNC or CIBM accounts. I did get information from the Burford firm that all the local account balances (less amounts to keep the accounts open) were swept into the Chase account at the end of October. Please confirm that the swept amount was transferred to the Lock Box.

I want to arrange complete and unfiltered access to all of GVS bank accounts and records and I do not think this can be done efficiently by exchanging emails. So let's try to have a call late today or first thing tomorrow to work on getting that access set up and to discuss next steps and process going forward.

My DL is

Please let me know your availability later today, after 4 pm ET or early tomorrow.

On Nov 8, 2021, at 1:44 PM, Barbie Lee <[blee@world-class.com](mailto:blee@world-class.com)> wrote:

Bob,

The \$148K disbursement was for GVS Payroll, and the \$96K wire was for the Management Fee. Both of these are in the approved cash collateral budget. I understand that after Friday no disbursements are to go out without your approval (even if in Cash Collateral Budget). As a practical matter, utilities will continue to be processed through ACH to keep the lights on (please confirm you are OK with the same), but we can develop a protocol for other payments going forward.

As a reminder I still need your driver's license that counsel has been requesting to complete the setup for you of bank accounts. Please advise which accounts you are still unable to access with the passwords provided specific to you.

Thank you,  
Barbie

Barbie Lee | Vice President, Accounting

WORLD CLASS  
[814 Lavaca Street | Austin, TX 78701](#)  
T [512.615.0906](#) | F [512.322.9238](#)  
[blee@world-class.com](mailto:blee@world-class.com) | [www.world-class.com](http://www.world-class.com)

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**From:** Robert Albergottti <[albergottib@gmail.com](mailto:albergottib@gmail.com)>  
**Sent:** Sunday, November 7, 2021 5:12 PM  
**To:** Barbie Lee <[blee@world-class.com](mailto:blee@world-class.com)>  
**Cc:** Rosenstein, Ross <[ross@hl.com](mailto:ross@hl.com)>; Miller, Jeri Leigh <[jeri.miller@sidley.com](mailto:jeri.miller@sidley.com)>; Hoffman, Juliana <[jhoffman@sidley.com](mailto:jhoffman@sidley.com)>; Matthew Niemann <[MNIemann@HL.com](mailto:MNIemann@HL.com)>; Jordan, Brad <[bjordan@hl.com](mailto:bjordan@hl.com)>; Thomas Califano Esq. <[tom.califano@sidley.com](mailto:tom.califano@sidley.com)>  
**Subject:** November DIP account withdrawals in first week in November

The Chase DIP account had a few withdrawals during the first week of November - one of which is a \$96k wire transfer to World Class Holdings (not GVS manager). GVS Manager separately received a \$148k wire transfer. Please provide detail on those disbursements.

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